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*Counsel to the Debtors  
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)  
(Jointly Administered)**

**NOTICE OF FILING OF PROPOSED ORDER GRANTING LATE CLAIM MOTION**

**PLEASE TAKE NOTICE** that, on September 13, 2021, Emanuel Thirkill filed a motion [Dkt. No. 3764] (the “**Late Claim Motion**”)<sup>2</sup> seeking leave to have his personal injury proof of claim (the “**Late Claim**”) deemed timely filed notwithstanding that the Late Claim was filed

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>2</sup> An unredacted version of the Late Claim Motion [Dkt. No. 3741] was filed on August 24, 2021. To comply with privacy guidelines, the unredacted version of the Late Claim Motion was restricted from public view, redacted, and refiled at docket number 3764.

after the extended general bar date in these chapter 11 cases (the “**Extended General Bar Date**”).

**PLEASE TAKE FURTHER NOTICE** that in light of the *Twelfth Amended Joint Chapter 11 Plan of Reorganization of Purdue Pharma L.P. and Its Affiliated Debtors* [Dkt. No. 3726] and the PI Trust Distribution Procedures appended thereto [Dkt. No. 3655], confirmed by this Court on September 17, 2021 [Dkt. No. 3787], which provide a mechanism for compensating personal injury claims that are deemed to be timely filed and channeled thereto, the Debtors do not object to the relief sought in the Late Claim Motion. The Official Committee of Unsecured Creditors and the Ad Hoc Group of Individual Victims also consent to the relief sought in the Late Claim Motion.

**PLEASE TAKE FURTHER NOTICE** that the Debtors hereby file a proposed Order Granting Late Claim Motion (the “**Proposed Order**”). Pursuant to the Proposed Order, the Late Claim will be treated as timely filed, and the Debtors will not object to the Late Claim based on it not being filed by the Extended General Bar Date. The Proposed Order is attached hereto as **Exhibit A**.

**PLEASE TAKE FURTHER NOTICE** that a copy of the Proposed Order and all related papers may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://restructuring.primeclerk.com/purduepharma>. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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Dated: October 6, 2021  
New York, New York

Respectfully submitted,

/s/ James I. McClammy

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